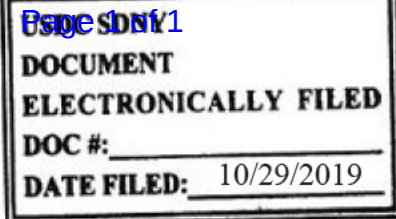


# Arnold & Porter

Kent A.  
+1 212.6  
Kent.Ya



October 28, 2019

Hon. Analisa Torres  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

Re: *Casa Express Corp. v. Bolivarian Republic of Venezuela*,  
No. 18 Civ. 11940 (AT)

*Pharo Gaia Fund Ltd. v. Bolivarian Republic of Venezuela*,  
No. 19 Civ. 3123 (AT)

Dear Judge Torres:

I write on behalf of the Bolivarian Republic of Venezuela ("Republic") in reference to the above-captioned cases.

On July 8, 2019, the Court directed that discovery in these actions should close on November 5, 2019, and set a briefing schedule for Plaintiffs' motions for summary judgment and the Republic's cross-motions to stay.

The Republic respectfully requests a 30-day extension in which to complete discovery. The extension is needed to finalize protective orders that will govern the disclosure of confidential materials in these actions, as well as to produce materials subject to the protective orders, and to conduct reasonable and focused follow-up discovery, if necessary, in response to the confidential materials produced.

Counsel for Plaintiffs in the above-captioned actions have consented to this request. The parties agree that granting this extension request will not alter or delay the existing briefing schedule.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Kent A. Yalowitz".

Kent A. Yalowitz

GRANTED. Discovery shall be completed  
by **December 5, 2019**.

SO ORDERED.

Dated: October 29, 2019  
New York, New York

A handwritten signature in black ink, appearing to read "Analisa Torres".

ANALISA TORRES  
United States District Judge